

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FILED

January 06, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: Julie Golden
DEPUTY

MWK RECRUITING, INC.

Plaintiff,

v.

EVAN P. JOWERS

Defendant.

Civil Action No. 1:18-cv-00444

EVAN P. JOWERS

Counterclaimant,

v.

**MWK RECRUITING, INC., ROBERT
E. KINNEY, MICHELLE W. KINNEY,
RECRUITING PARTNERS GP, INC.,
KINNEY RECRUITING LLC,
COUNSEL UNLIMITED LLC, and
KINNEY RECRUITING LIMITED**

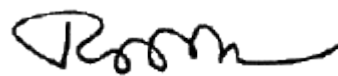
Counter-defendants.

ADDENDUM TO CONFIDENTIALITY AND PROTECTIVE ORDER

The following provisions shall amend the Confidentiality and Protective Order
(Dkt. 70) previously entered in this case (the “Protective Order”):

1. Robert E. Kinney is and shall henceforth during the remainder of this case remain a “Qualified Person” for all information designated “Confidential,” “For Counsel Only,” or “Attorneys Eyes Only” under the Protective Order.
2. There is hereby created a third designation category under the Protective Order entitled “Non-Party Counsel Only,” which is applicable to records which presently would cause Jowers competitive injury if known to MWK. For the avoidance of doubt, this category shall be limited to information about candidate interviews or submissions for consideration of candidates at clients which have occurred within the 90 days preceding disclosure, but such category shall not include information about completed placements of candidates at any time.
3. Information marked “Non-Party Counsel Only” shall automatically revert to “For Counsel Only” 90 days only after a candidate placed through Jowers’ recruiting firm commences work at a new law firm.
4. Neither Robert E. Kinney nor any non-attorney party designee shall be a Qualified Person for information designated “Non-Party Counsel Only.”
5. All other provisions of the Protective Order pertaining to “For Counsel Only” or “Attorneys Eyes Only” information not in conflict with this addendum shall apply equally to “Non-Party Counsel Only” information.

SIGNED on January 6th, 2021.



ROBERT L. PITMAN
UNITED STATES DISTRICT JUDGE